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FILED VIA ECF

Honorable Valerie Caproni, USDJ
Thurgood Marshall
US Courthouse
40 Foley Square
New York, NY 10007-1312

Re: US v. Antonio DiMarco, et al
Dkt # 18 cr 863

Dear Judge Caproni:

On July 30, 2019, I represented to the Court that I received 251,804 individual files of discovery. This was based on my preliminary review of one folder of materials (i.e., iPhone Data Bitlocker Electronic Folder). It turns out that the 251,804 individual files are only a small fraction of the materials provided by the Government. Given our progress, the amount left to review, and our time limitations, I have determined that it is not feasible to adequately review the materials prior to the October 23, 2019 trial date. I plan to discuss this matter with the Government in further detail during the week of September 3, 2019. After I have addressed this with the Government, I will provide the Court with a further update no later than September 6, 2019.

Thank you for your thoughtful consideration.

Sincerely,

FOY & SEPLOWITZ LLC

Jason E. Foy

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